

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

NICOLE EDWARDS

CIVIL ACTION NO. 2:19-cv-01150

Versus

JUDGE JAMES D. CAIN, JR.

CITY OF LAKE CHARLES, ET AL

**MAGISTRATE JUDGE: KATHLENE
KAY**

**MOTION IN LIMINE TO EXCLUDE AND/OR LIMIT TESTIMONY AND EVIDENCE
OF NICOLE EDWARDS' CRIMINAL HISTORY**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Nicole Edwards, who respectfully moves this Honorable Court to grant Plaintiffs' Motion in Limine to Exclude and/or Limit Testimony and Evidence Nicole Edwards' Criminal History to bar any mention the below facts and documents regarding any criminal arrests and convictions of Nicole Edwards:

1. Any reference of any arrest or conviction of any misdemeanor offense;
2. Any reference of arrest or conviction of a felony offense;
3. Any printout of any law enforcement agency showing arrests, nolle prosee, dismissals, and misdemeanor convictions of Nicole Edwards.

Further, admission of Nicole Edwards' criminal history would violate Fed. R. Evid. Rules 406, 403, 401, 609, and 404.

WHEREFORE, Plaintiff respectfully requests this Court grant this Motion in Limine to Exclude and/or Limit Testimony and Evidence of Nicole Edwards' Criminal History.

Respectfully Submitted,

/s/Glenn C. McGovern
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CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing pleading has been electronically filed with the Clerk of Court using the ECF system which sent notification to all counsel of record who are ECF users on this 16th day of September, 2021.

/s/Glenn C. McGovern

Glenn C. McGovern